

August 19, 2005

California Department of Water Resources
Division of Planning and Local Assistance
Attn: Tracie Billington
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Ms. Billington,

The San Gabriel and Lower Los Angeles Rivers Watershed Integrated Regional Water Management Group includes fourteen agencies, the County of Los Angeles Department of Public Works, Rivers and Mountains Conservancy, Los Angeles County Sanitation Districts, Central Basin Municipal Water District, City of Long Beach, City of El Monte, Water Replenishment District, Gateway Cities Council of Governments, Watershed Conservation Authority, Los Angeles and San Gabriel Rivers Watershed Council, TreePeople, Mountains Recreation and Conservation Authority, California Coastal Conservancy and Amigos de los Rios. We have reviewed the Draft PSP for the Integrated Regional Water Management Implementation Grants, Step 2 and several of our members attended the Draft PSP discussion workshop in Los Angeles. Our group strongly supports the Integrated Regional Water Management Plan approach to water issues in the state.

We encourage significant modifications be made to the Step 2 process and that additional time be given to allow agencies/organizations to make more thorough comments on these procedures. There are three major areas of concern: 1) much of the information requested is repetitive of the Planning Grant application requirements and therefore should not be required for agencies/organization that have already submitted the information and 2) the level and type of detailed information requested particularly for the economic analysis section does not seem to have a practical time line and 3) the time allowed between the workshop and the application submittal is extremely short.

In addition we have the following specific comments:

Page 9, Table 1: The majority of the requested items are duplicative of information requested under Step 1 General Information items. We recommend deletion of most of the items to avoid repetition of the same information.

Page 12, Section III Eligibility Requirements, 2005 UWMP: Can the applicant be assured that if their UWMP is submitted prior to Dec. 31, 2005, that a review letter from the DWR will be sent in time to the applicant for Step 2 compliance?

Page 13, Attachment 1, Authorizing Documentation and Attachment 2, Eligible Applicant Documentation: These documents were requirements under Step 1.

Page 15 Attachment 10: The PAEP should be standardized by project type to assure equitable implementation and review across the State. Form or specific guidelines should be provided by the State.

Page 16 Attachments 11 and 12: These attachments are a duplication of efforts from Step 1.

Page 16 Attachment 13: The request of financial records brings about the concern of how the State can evaluate and use this data. Some proposals from regional agencies will include multiple projects from multiple agencies. This amount of financial data being requested appears excessive at this stage. We recommend that a financial form or worksheet be used to be filled out by each requesting agency to assure an equitable representation across regions of the State.

Page 30: Bullets 1, 2 and 4 appear to be excessive pre-contract requirements. Typically these items are discussed in project specifications and contract documents wherein state requirements must be followed.

Page 33 Replacement Costs: A listing of replacement costs over a 50 year life cycle appears excessive for most water infrastructure projects. Unless the project is a large scale public works project such as a dam or reservoir, it is unlikely that a 50 year life cycle is typical. We recommend that a 20 year life cycle be shown instead. If this cannot be used, then we recommend language allowing shorter life cycles as appropriate.

Page 36 Exhibit F: Overall this section is unnecessarily administratively burdensome. For water quality improvement and water recycling projects, we recommend that more simplified evaluations of avoided future costs use approaches often used by the SWRCB Revolving Loan Program of which most water agencies are familiar with.

We recommend that the 50 year economic analysis also be decreased to 20 years unless the size of the project is likely to realize a 50 year life cycle. If this cannot be done, please provide language that allows for alternate life cycles studies as appropriate to the likely life cycle of the project.

Page 42, Benefits Analysis: This section states that if a benefit cannot be quantified, it must be described in a narrative style. We believe that a narrative approach is subject to interpretation and value system of the reviewer. We request that the extensive bullet list of required benefit analyses be replaced with a simplified table of benefits.

Page 44, Bullet Column (e): Is the per unit monetary value of a benefit to the State affected by the local share of funding? There may be projects that may become far more beneficial to the State if a significant percentage of a project is locally funded. How is this incorporated into Table F-4 analysis?

Page 46, Table F-5 Again the 50 year planning horizon appears unreasonably long for most water infrastructure projects; we request that this be reduced to 20 years.

Page 50, Exhibit G Other Expected Benefits: The first sentence of the first paragraph suggests that computer models may be necessary to conduct the quantitative analyses of benefits. Such extensive economic analysis unduly penalizes smaller agencies that have submitted projects as part of an integrated regional watershed program. We request that a simplified table of benefits replace the detailed documentation of economic analyses of other expected benefits.

Page 51, Flood Control: We recommend that the autonomy be given to the applicant to assure that the project meets all professional engineering standards for flood control. Under this section, the State suggests software programs for flood control analysis. This

appears to be overly directive by the State in the process of assuring a project meets industry standards.

Page 52, Exhibit H Scientific and Technical Merit: This entire section is asking information that appears to question the technical capability of the implementing agency with unduly burdensome requirements. Further technologies that address storm water and urban runoff water quality are new, therefore determining what principles are proven or accepted may be subjective.

The Environmental Documentation and Permits and Certifications requirements appear to be overly administratively burdensome to be applied to all projects of an integrated program submitted under an application

We appreciate the opportunity of providing comments on this PSP and look forward to working with the SWRCB and DWR on the application process.

Sincerely,

Belinda Faustinos
On behalf of
San Gabriel and Lower Los Angeles Rivers
IRWM Plan Management Group